

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

GOVERNMENT'S MOTION TO SEAL  
INDICTMENT

Pursuant to Fed. R. Crim. P. 6(e)(4), the United States of America hereby moves this Court to direct that the indictment be sealed (and that no person shall disclose the return of the indictment except when necessary for the issuance and execution of a warrant) until such time that the defendant is in custody, at which point the indictment shall be unsealed automatically. As grounds for this motion, the government states that public disclosure of these materials at this point might jeopardize the government's ability to arrest the defendant. Once the defendant is arrested, there is no need for the indictment to remain secret.

The United States further moves, pursuant to General Order 06-05, that the United States Attorney, through undersigned counsel, be provided copies of all sealed documents that the United States has filed in this matter.

Respectfully submitted,

RACHAEL S. ROLLINS  
United States Attorney

By:

James R. Drabick  
Assistant U.S. Attorney

Date: July 19, 2022

## Motion to Seal Allowed

Jul 19, 2022



John C. Bell